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Attorneys for Plaintiff  
GOLDEN GATE TECHNOLOGY, INC.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

GOLDEN GATE TECHNOLOGY, INC., a ) Case No.: 3:11-cv-04862-YGR  
California Corporation ) **STIPULATION AND ~~PROPOSED~~**  
 ) **ORDER TO CHANGE TIME TO FILE**  
 ) **THE JOINT CASE MANAGEMENT**  
 ) **STATEMENT**

Plaintiff,

vs.

MAGMA DESIGN AUTOMATION, INC., a )  
Delaware Corporation,

Defendant

Plaintiff Golden Gate Technology, Inc. ("Plaintiff") and Defendant Magma Design Automation, Inc. ("Defendant") hereby agree and stipulate as follows:

WHEREAS, Plaintiff served Defendant with the Summons and Complaint on or about November 28, 2011;

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3 WHEREAS, this case was reassigned to the Honorable Richard Seeborg on December  
4 16, 2011 (ECF No. 11) and the Court scheduled the Case Management Conference for  
5 February 23, 2012 (ECF No. 12);

6 WHEREAS, Defendant's response to the Complaint is presently set for February 1,  
7 2012;

8 WHEREAS, there have been two previous stipulations for extensions of time for  
9 Defendant to respond to the Complaint (ECF Nos. 13 and 15);

10 WHEREAS, pursuant to the Reassignment Order (ECF No. 16), this case was  
11 transferred to the Honorable Yvonne Gonzalez Rogers on January 18, 2012;

12 WHEREAS, pursuant to the Reassignment Order, all case management dates are  
13 vacated and to be reset by the Court (Reassignment Order, sec. A, ¶ 6);

14 WHEREAS, the Reassignment Order further ordered the filing of a Joint Case  
15 Management Conference Statement by January 27, 2012 (Reassignment Order, sec. B);

16 WHEREAS, prior to the Reassignment Order, the Joint Case Management Conference  
17 Statement was due by February 16, 2012;

18 WHEREAS, prior to learning of the Reassignment Order, the parties scheduled an in-  
19 person settlement discussion for January 27, 2012, and intend to conduct a good-faith  
20 settlement discussion on that date;

21 WHEREAS, no trial date has yet been set in this action;

22 WHEREAS, the parties agree that rescheduling the due date for the Joint Case  
23 Management Conference Statement to a date after the filing of Defendant's response and the  
24 settlement discussions would allow for a more substantive Joint Case Management Conference  
25 Statement;

26 WHEREAS, the parties agree that rescheduling the Joint Case Management  
27 Conference Statement would lead to a more efficient use of judicial resources and orderly  
28 management and scheduling of the case; and

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3 WHEREAS, the parties agree that the last day to file the Joint Case Management  
4 Conference Statement shall be the later of February 16, 2012, or fourteen days prior to the date  
5 of the Case Management Conference, which is to be set by the Court.

6 IT IS HEREBY STIPULATED that pursuant to Civil Local Rule 6-2 and the  
7 Declaration of Bradley J. Levang that the last day to file the Joint Case Management  
8 Conference Statement shall be the later of February 16, 2012, or fourteen days prior to the date  
9 of the Case Management Conference, which is to be set by the Court.

10 Date: January 20, 2012

Respectfully Submitted,

11 O'MELVENY & MEYERS LLP  
12

13 By: /S/ Mark E. Miller

MARK E. MILLER

14 Attorneys for Defendant

15 MAGMA DESIGN AUTOMATION, INC.  
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18 Date: January 20, 2012

Respectfully Submitted,

19 THE LAW OFFICES OF ANDREW D.  
20 FORTNEY, Ph.D., P.C.  
21

22 By: /S/ Bradley J. Levang

ANDREW D. FORTNEY

23 SHERRIE M. FLYNN

24 BRADLEY J. LEVANG

Attorneys for Plaintiff

25 GOLDEN GATE TECHNOLOGY, INC.  
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27 *Pursuant to General Order 45, § X.B, the filer hereby attests that concurrence in the filing of*  
28 *this document has been obtained from each of the other signatories.*

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**~~PROPOSED~~ ORDER**

Pursuant to the Stipulation above, the parties must file their Joint Case Management Conference Statement by February 13, 2012, rather than January 27, 2012. A Case Management Conference will be held on February 27, 2012.

**IT IS SO ORDERED.**

Date: January 24, 2012

  
YVONNE GONZALEZ ROGERS  
UNITED STATES DISTRICT JUDGE